

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CSI INTERNATIONAL,

07 Civ.3787 (SAS)

Petitioner,

NOTICE OF REMOVAL  
(Diversity)

-against-

D&M NEW WORLD MANAGEMENT, INC.,  
doing business as APOLLO FINE SPIRITS

Respondent.

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TO THE CLERK OF THE ABOVE-ENTITLED COURT

PLEASE TAKE NOTICE that Respondent, D&M New World Management, Inc.,  
doing business as Apollo Fine Spirits, hereby removed to this Court the State Court action  
described below:

1. On or about May 2, 2007, Petitioner, CSI International, filed a civil action  
in the form of a special proceeding to confirm an arbitration award, against Respondent,  
D&M New World Management, Inc., doing business as Apollo Fine Spirits, in the  
Supreme Court of the State of New York, County of New York under Index  
No.106183/07.

2. The civil action arises out of an arbitration between Petitioner and  
Respondent, and the Petitioner's Notice of Petition and Petition to Confirm an Arbitration  
Award in connection therewith.

3. There are no other party defendants.

4. This action is removable to this Court pursuant to 28 U.S.C. §1332(a)(1), which vests the District Court with original jurisdiction over civil actions where the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs, and where the controversy is between citizens of different states.

5. According to the Notice of Petition and Petition to Confirm Arbitration Award, Petitioner is a French corporation with its principal place of business located at 90 rue de Vincennes, 33000 Bordeaux, France while Respondent is a New York corporation with its principal place of business located at 50 Hempstead Gardens Drive, West Hempstead, New York.

6. Petitioner has made a monetary demand in the Petition to Confirm Arbitration Award of \$124,493.95 and 352,708.48 euros against Respondent.

7. This Notice of Removal is timely under 28 U.S.C. § 1446(b) and Federal Rules of Civil Procedure 6(a).

WHEREFORE, Respondent, D&M New World Management, Inc., doing business as Apollo Fine Spirits, prays that this Honorable Court will take jurisdiction over this action from the Supreme Court of the State of New York, County of New York, to the United States District Court for the Southern District of New York

Dated: New York, New York  
May 15, 2007

Yours, etc.  
LAZARUS & LAZARUS, P.C.

By: /S/ Gilbert A. Lazarus, Esq.  
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TO: SUPREME COURT OF THE STATE OF NEW YORK  
County of New York  
Clerk's Office  
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